

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA

**FILED**

JAN 06 1999

IN RE: )  
INTERNATIONAL HERITAGE, INC., )  
 )  
Address: )  
2626 Glenwood Ave., #200 )  
Raleigh, NC 27608 )  
ID#: 56-1921093 )  
Debtor. )

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.  
CASE NO.: 98-02675-5-ATS

APPLICATION FOR POST-PETITION RENT  
11 U.S.C. SECTIONS 503 AND 506

NOW COMES Printing Plus, Inc. by and through counsel and submits this application for post-petition rent as an administrative claim pursuant to 11 U.S.C. § 503 and an alternative claim under 11 U.S.C. Section 506.

IN SUPPORT OF ITS APPLICATION, Printing Plus, Inc. shows the following unto the court:

1. Printing Plus, Inc. is a creditor in the above-referenced matter.
2. This bankruptcy was filed on or about November 25, 1998. Prior to the bankruptcy filing, Printing Plus, Inc. allowed the debtor to store its products in its warehouse. Said products are still located in the Printing Plus warehouse.
3. Rent continues to accrue on the storage space at the rate of \$4,246.25 per month.
4. Upon information and belief, the Trustee intends to sell the products for the benefit of the estate.
5. The storage provided by Printing Plus, Inc. has been and is beneficial and necessary to preserve and protect the assets of the Bankruptcy Estate.

WHEREFORE, Printing Plus, Inc. prays the court to enter an order allowing it to recover post-petition rents pursuant to 11 U.S.C. § 503 or, in the alternative, pursuant to 11 U.S.C. § 506.

Respectfully submitted, this the 6<sup>th</sup> day of January, 1999.

JORDAN PRICE WALL GRAY, JONES & CARLTON  
Attorneys for Printing Plus, Inc.

By: Shawna Y. Staton  
Shawna Y. Staton  
State Bar No. 16512  
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Raleigh, NC 27602  
(919) 828-2501

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NOTICE

TO: THE DEBTOR, ATTORNEY FOR THE DEBTOR, TRUSTEE AND OTHER PARTIES  
IN INTEREST

NOTICE IS HEREBY GIVEN of the Application for Allowance of Post-Petition Rent as an Administrative Claim filed simultaneously herewith by Printing Plus, Inc. in the above captioned case; and

FURTHER NOTICE IS HEREBY GIVEN that this application may be allowed provided no response and request for a hearing is made by the debtor, trustee or other parties in interest in writing to the Clerk of this Court within twenty (20) days from the date of this notice; and

FURTHER NOTICE IS HEREBY GIVEN that if a response and a request for a hearing is filed by the debtor, trustee, or other parties in interest named herein in writing within the time indicated, a hearing will be conducted on the motion and response thereto at a date, time and place to be later set by this Court and all interested parties will be notified accordingly. If no request for a hearing is timely filed, the Court may rule on the motion and response thereto ex parte without further notice.

DATE OF NOTICE: 1-6-99

JORDAN PRICE WALL GRAY JONES & CARLTON, P.L.L.C.  
Attorneys for Printing Plus

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Shawna Y. Staton  
State Bar No. 16512  
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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served a copy of the foregoing Application for Allowance of Post-Petition Rent as an Administrative Claim, Notice, and (proposed) Order by depositing a copy of the same in the United States Mail, postage prepaid, in envelopes addressed to the following:

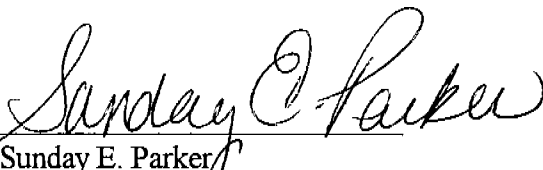
Holmes P. Harden, Esq.  
Maupin, Taylor & Ellis, P.A.  
3200 Beechleaf Ct., Suite 500  
P.O. Drawer 19764  
Raleigh, NC 27619-9764  
*Bankruptcy Trustee*

Marjorie K. Lynch  
Bankruptcy Administrator  
P.O. Box 3758  
Wilson, NC 27894-3758  
*Bankruptcy Administrator*

Terri L. Gardner  
Smith Debman Narron & Myers, LLP  
4700 New Bern Avenue  
P.O. Box 26268  
Raleigh, NC 27611-6268  
*Attorney for Debtor*

This 15th day of January, 1999.

By:

  
Sunday E. Parker